

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Bay State Gas Company

D.T.E. 06-31

**ATTORNEY GENERAL'S FORTH SET OF
DOCUMENT AND INFORMATION REQUESTS**

AG-4-1 Please refer to the response to AG 2-6, which states, in part “The NiSource Board of Directors approves each budget annually as part of the NiSource financials.”

- a) Provide a copy of the minutes of the meeting of the NiSource Board of Directors that approved the budget for BayState for the years 2006 to 1999.
- b) Provide a copy of the minutes of the meeting of the NiSource Board of Directors that approved the main replacement budget for BayState for the years 2006 to 1999.
- c) Provide any presentations, handouts, budget analysis or reports to the NiSource Board of Directors for the years 2000 to 2004 that address the BayState budget.
- d) Provide any presentations, handouts, budget analysis or reports to the NiSource Board of Directors for the years 2000 to 2004 that address the BayState budget for staffing levels and main replacement.

AG-4-2 Please refer to Transcript, Volume 2, p. 309, DTE 05-27, where the Company witness Dan Cote stated, in part,: “In early 2004 we recognized, frankly, that the reductions that had occurred during the consolidation of NiSource had gone a little too deep.”

- a) State all facts and provide copies of all documents that Mr. Cote relied upon to support his statement.

- b) Where the “reductions” part of a cost cutting plan or merger integration program?
- c) If the answer to AG 4-2(b) is yes, provide a copy of this plan or program and any updates or revisions. Provide all copies of all reports, analysis, e-mails and memorandums to or from Dan Cote or Steve Bryant for the years 2002-2004 that discuss the “reductions.”
- d) If the answer to AG 4-2(b) is no, discuss in detail why the Company had engaged in the “reductions.”

AG-4-3 Please refer to the response AG 2-3(B).

- a) Do these charts include information for the Company’s Massachusetts operations alone? If no, then produce copies of the the response for the Company’s Massachusetts operations.
- b) Define the term “Units” for “New Mains Installed” and “Replacement Mains”.
- c) Produce copies of all e-mails, reports or memorandums to or from Dan Cote or Steve Bryant related to “New Mains Installed” and “Replacement Mains” for the years 2000 to 2005.
- d) Do the approved annual baseline budgets and year end actual expenses include main leak repairs? If yes, please explain where. If no, produce annual baseline budgets and year end actual expense charts that include main leak repairs. Produce copies of all e-mails, reports or memorandums to or from Dan Cote or Steve Bryant related to main leak repairs for the years 2000 to 2005.
- e) Provide any e-mails, letters or memorandums to or from NiSource that relate to setting the annual baseline budget for “Replacement Mains” for the years 2000 to 2005.
- f) Provide further detail to the rows for “Replacement Mains” for the years 1999 to 2006 by breaking out this figure by main material type and service area.

Date: September 5, 2006